

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MV3 PARTNERS LLC,

Plaintiff,

v.

ROKU, INC.,

Defendant.

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Civil Action No.: 6:18-cv-308-ADA

JURY TRIAL DEMANDED

**DECLARATION OF RODNEY R. MILLER IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Rodney R. Miller, declare as follows:

1. I am an Associate with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Plaintiff MV3 Partners LLC in this matter. I make this declaration in support of Plaintiff's Opposition to Defendant's Motion to Transfer Venue to the Northern District of California. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the LinkedIn Profile for Scott de Haas.

3. Attached hereto as Exhibit 2 is a true and correct copy of the LinkedIn Profile for Ben Combee.

4. Attached hereto as Exhibit 3 is a true and correct copy of the LinkedIn Profile for Ken Krakow.

5. Attached hereto as Exhibit 4 is a true and correct copy of the LinkedIn Profile for

Marcus Grande.

6. Attached hereto as Exhibit 5 is a true and correct copy of the LinkedIn Profile for Matthew Hodgins.

7. Attached hereto as Exhibit 6 is a true and correct copy of the LinkedIn Profile for Rob Edgell.

8. Attached hereto as Exhibit 7 is a true and correct copy of the LinkedIn Profile for Roger Sunshine.

9. Attached hereto as Exhibit 8 is a true and correct copy of the LinkedIn Profile for Wes Guidry.

10. Attached hereto as Exhibit 9 is a true and correct copy of the LinkedIn Profile for Yi He.

11. Attached hereto as Exhibit 10 is a true and correct copy of Roku job postings in Austin, Texas, available at <https://www.roku.com/jobs/listing/austin--texas?location=Austin%2C%20Texas> (last accessed February 22, 2019).

12. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt from the United States District Courts – National Judicial Caseload Profile, available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0930.2018.pdf.

13. Attached hereto as Exhibit 12 is a true and correct copy of the Franchise Search Results for Roku, Inc.

14. Attached hereto as Exhibit 13 is a true and correct copy of an article titled “Roku plans expansion into Austin,” by Amy Denney available at <https://communityimpact.com/austin/news/2014/02/07/roku-plans-expansion-into-austin-2/>.

15. Attached hereto as Exhibit 14 is a true and correct copy of an article titled, “Tech

company Roku to open Austin development center,” by Lori Hawkins, available at <https://www.statesman.com/BUSINESS/20140206/Tech-company-Roku-to-open-Austin-development-center>.

16. Attached hereto as Exhibit 15 is a true and correct copy of the Order Denying Defendant’s Motion to Transfer Pursuant to 28 U.S.C. § 1404(a), *Uniloc USA, Inc. v. Google, Inc.*, No. 2:16-cv-566, Dkt. 75 at 5 (E.D. Tex. May 15, 2017).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 13th day of March, 2019, in Atlanta, Georgia.

/s/ Rodney R. Miller
Rodney R. Miller